

FACT SHEET

Transportation of Formerly Utilized Sites Remedial Action Program Waste

FUSRAP

Formerly Utilized Sites Remedial **Action Program**

"Public Health and Safety are the U.S. **Army Corps of** Engineers' **Highest Priorities**" The primary modes of transporting Formerly **Utilized Sites Remedial Action Program** (FUSRAP) wastes are commercial railcar or truck. Depending upon the waste classification, it will be shipped as one of the following:

- As a U.S. Department of **Transportation** (DOT) Hazard Class 7, Radioactive Material. This applies to shipments having specific activity greater than 0.002 microcuries per gram.
- As a U.S. Department of Transportation (DOT) Hazard Class 9, Miscellaneous Hazardous Material. Much of the FUSRAP waste does meet the DOT Class 7 definition above. However, the waste may still be regulated as a miscellaneous hazardous material, because it is considered a hazardous substance or hazardous waste by regulation.
- · As a non-U.S. Department of Transportation (DOT) regulated material. Shipments that do not meet the definition of a Class 7 radioactive material or a Class 9 miscellaneous hazardous material are not subject to regulation by the DOT.

When shipping FUSRAP material, the following types of shipping documents may accompany the shipment:



A railcar is in final preparation for transportation of FUSRAP wastes. The wastes are wrapped in a "Burrito Bag" which is made of high tech materials called a geomembrane, an extremely durable type of plastic.

- A Uniform Lowlevel Radioactive Waste Manifest. This is used for wastes shipped to a Nuclear Regulatory Commission or statelicensed radioactive waste disposal facility.
- An Environmental **Protection Agency or State Hazardous** Waste Manifest. This is used for shipments containing Resource Conservation and Recovery Act (RCRA) hazardous wastes

regulated by the U.S. Environmental Protection Agency (EPA) or a state.

• A Bill of Lading. This is used for DOT regulated hazardous material which does not require a manifest by the Nuclear Regulatory Commission, EPA, or a state.



Workers decontaminate all trucks hauling FUSRAP materials before they are allowed to leave the cleanup site.

Restoring the Environment is the U.S. Army Corps of Engineers' Ultimate Goal.

 A Chain of Custody. This tracking process is used for shipments that do not require any of the above listed shipping documents. Though not required by other federal or state agencies or law, the U.S. Army Corps of Engineers (Corps) has decided to track these low hazard wastes using a chain

nazard wastes using a character of custody.

The shipping documents perform several important functions. They are used to:

- track shipments to ultimate disposal;
- provide information on where it is coming from and where it is going to;
- describe the amount of material being shipped;
- identify the hazards presented by the materials; and
- provide a 24-hour phone number to be called in the event of an emergency.

Hazards also are identified by marking, labeling, and signage for the shipments as required by the DOT. As an added measure for shipments not regulated by the DOT, the Corps uses a tracking document and a special marking sticker to be placed on FUSRAP waste containers also states, "Empty only at: _(destination facility)_____", and that provides the shipper's name and phone number. All Corps employees executing DOT shipping documents

are formally trained, officially designated, and authorized to sign FUSRAP documents "On behalf of the U.S. Army Corps of Engineers." Training requirements for Corps personnel are specified in the following regulations:

- U.S. Department of Transportation, transportation training, 49 CFR 172, Subpart H;
- U.S. Environmental Protection Agency, Resource Conservation and Recovery Act training, 40 CFR 262.34 and 265.16, for hazardous waste activities only;
- Department of Labor/OSHA, 29 CFR 1910.120 (General Industry)/29 CFR 1926.65 (Construction) for all hazardous waste operations and emergency response.

Through the use of the described shipping documents, marking, labeling, and signs, the FUSRAP

materials hazards are identified throughout the transportation process.



U.S. Department of Transportation regulations are followed by the U.S. Army Corps of Engineers.

